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Author: Andrew E. Gallegos				

Environmental Restoration Project
Quality Procedure

for:

PLANNING, PERFORMING, AND MANAGING SURVEILLANCES

Los Alamos
NATIONAL
LABORATORY
Los Alamos, New Mexico 87545

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Planning, Performing, and Managing Surveillances

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Planning, Performing, and Managing Surveillances

1.0 PURPOSE

This QP states the responsibilities and describes the process for planning, performing and managing surveillances on the ER Project

2.0 SCOPE

This QP is a mandatory document and shall be implemented by all ER Project participants when performing surveillance activities for the ER Project.

3.0 REFERENCES

3.1 ER Project personnel should become familiar with the contents of the following documents to properly implement this QP.

- ER Project Quality Management Plan located at http://erinternal.lanl.gov/home_links/Library_proc.htm.
- QP-2.2, Personnel Orientation and Training
- QP-3.2, Lessons Learned
- QP-3.4, Managing Nonconformances, Deficiencies and Corrective Actions
- QP-4.4, Record Transmittal to the Records Processing Facility
- QP-4.10, Document Development and Transmittal Process: Peer Review Not Required
- QP-10.3, Stop Work and Restart
- Management Assessment Report Template

4.0 DEFINITIONS

- 4.1 *Finding*—A statement of fact relating to compliance or noncompliance with previously agreed upon procedure, policies, codes, standards, specifications, or other forms of contractual or legal obligation.
- 4.2 *Hold Point*— A point at which work or other activities must stop until specified actions are completed.
- 4.3 *Notification Point* — A point in the work or activity process where notification is requested to allow for observation, surveillance, inspection, testing, or other purposes.
- 4.4 *Observation* — A conclusion that presents the results of a generally subjective observation related to areas under review. An observation may

be expressed as an opinion or concern not based on written requirements, or may identify a minor noncompliance not considered substantive enough to merit a finding.

- 4.5 Surveillance — The act of monitoring or observing to determine whether an item or activity conforms to specified requirements. Surveillances are a limited scope independent assessment.

5.0 RESPONSIBLE PERSONNEL

The following personnel are responsible for activities identified in Section 6.0 of this procedure.

- 5.1 Supervisor — An individual assigned to the ER Project who is a group, focus, task, or project leader or a manager with the authority and responsibility to direct and authorize ER Project activities. A supervisor may also be an individual directed by the ER Program Manager or Focus Area Project Leader to act in her or his behalf.
- 5.2 Quality Program Project Leader (QPPL)
- 5.3 Quality Liaison
- 5.4 Surveillant
- 5.5 ER Project personnel
- 5.6 User

6.0 PROCEDURE

Note: Subcontractors performing work under the ER Project's quality program may follow this quality procedure (QP) for performing surveillances or may use their own procedure(s) as long as the substitute meets the requirements prescribed by the ER Project Quality Management Plan, and is approved by the Environmental Restoration (ER) Project's Quality Program Project Leader (QPPL) before the commencement of the designated activities.

Note: ER Project personnel may produce paper copies of this procedure printed from the controlled-document electronic file located at http://erinternal.lanl.gov/home_links/Library_proc.htm. However, it is their responsibility to ensure that they utilize and train to the current version of this procedure. The author may be contacted if text is unclear.

- 6.1 Schedule Surveillance
 - 6.1.1 The **QPPL** shall schedule surveillances to examine activities in progress to determine whether they comply with applicable procedures or requirements.

6.1.2 The **QPPL** shall arrange surveillance's with the Supervisor of the activities to be surveilled in time to allow scheduling of people and facilities. The type of notification and amount of notice given, and the details provided should be adjusted to the circumstances of each surveillance.

6.1.3 The **QPPL** shall consider the following criteria when scheduling surveillance:

- Activity areas identified as problem areas during previous surveillance's or assessments.
- Requests from management of user organizations for surveillances.
- Schedules of activities underway.
- Commitments given to customer organizations for the performance of surveillance's.
- The complexity, uniqueness, or risk of an activity.
- The need for the verification of quality achieved, for the implementation of procedures, or for the acceptance of work or services.

6.2 Number the Surveillance

6.2.1 During the preparation for a surveillance, the **surveillant** shall initiate a document signature form, located at <http://erinternal.lanl.gov/DocCatalog/> by obtaining an ER Document Catalog Number in accordance with QP-4.10, Document Development and Transmittal Process: Peer Review Not Required, located at http://erinternal.lanl.gov/home_links/Library_proc.htm.

6.3 Plan the Surveillance

6.3.1 The **surveillant** shall plan the surveillance as follows:

- Notify in writing the organization scheduled for surveillance. Retain the written notification as surveillance record.
- Obtain the procedures, manuals, statements of work, contract specifications, regulations, or other documents containing requirements that apply to the activity.
- Review the requirements to determine the surveillance scope.
- The **surveillant** may develop a surveillance checklist to identify the specific requirements. Surveillance checklists may be standardized, or prepared specifically for the surveillance, depending on the type, scope, and depth of the surveillance. A

marked-up copy of the requirements document may be used as a checklist.

- Establish “Hold” or “Notification Points”, if appropriate with the organization responsible for the activity scheduled for surveillance. “Hold” or “Notification Points” may be established orally or in writing.

6.4 Perform Surveillance

- 6.4.1 Upon arrival at the surveillance location, the **surveillant** shall announce his or her presence with the appropriate ER Project participants. The surveillant shall also state the purpose of the surveillance.
- 6.4.2 When the surveillance is scheduled in technical areas, the surveillant may enlist a technical specialist from another organization to help in the surveillance.
- 6.4.3 The technical specialist cannot be directly involved with the areas to be surveilled.
- 6.4.4 The **surveillant** shall ensure, before the start of the surveillance, that the technical assistant is familiar with the purpose and goals of the surveillance.
- 6.4.5 Depending upon the nature of the surveillance or when it is specifically requested, the surveillant may conduct an informal entrance meeting to describe the planned activities and scope of the surveillance.
- 6.4.6 The **surveillant** shall complete the surveillance according to plan, using the pre-established surveillance checklist, investigative skills, interviews, reviews of documentation, and/or direct observation.
- 6.4.7 The **surveillant** shall complete the checklist as the surveillance proceeds. If other significant items outside of the planned areas are discovered, they should be pursued by the surveillant, as deemed appropriate, to identify or quantify the problem. Unrelated items may be deleted from the checklist during the surveillance.
- 6.4.8 The **surveillant** shall base surveillance results on objective evidence drawn from the observations of activities, conditions, analysis of documentation as well as the statements by people performing the activity.
- 6.4.9 Whenever possible, the **surveillant** identifies for later follow-up specific activities observed or the documents analyzed and identifies activities that comply with requirements as satisfactory.

- 6.4.10 The **surveillant** shall immediately identify and report nonconforming or deficient conditions or actions to the personnel responsible in order to allow immediate correction and/or improvement.
- 6.4.11 The **surveillant** shall document corrections that are made immediately in the Surveillance Report.
- 6.4.12 If during the surveillance, an imminent hazard is identified, the **surveillant** shall immediately inform the involved personnel and request that they cease activities until the hazard is corrected.
- 6.4.13 At the completion of the surveillance and before leaving an area the **surveillant** shall notify the responsible supervisor of the surveillance results.
- 6.4.14 If deficient areas are identified the **surveillant** obtains compliance or requests a statement of planned actions with a date for completion.
- 6.4.15 If significant deficiencies exist, the **surveillant** informs the responsible supervisor and issues, a stop work and restart report to suspend activities until the deficiencies are resolved (see QP-10.3, Stop Work and Restart).
- 6.4.16 If requested or if the surveillance results require more explanation than provided by a written report, the **surveillant** holds an exit meeting.
- 6.5 Complete Surveillance Report
- 6.5.1 The **surveillant** reports surveillance results in a standard format (see Management Assessment Template located at http://erinternal.lanl.gov/home_links/Library_doctemp.htm) within 5 working days.
- 6.5.2 The report shall include the following:
- a summary of the areas and activities surveilled
 - a list of people contacted, and
 - the results of the surveillance.
- 6.5.3 The surveillance report level of detail and length will depend on the scope and depth of the surveillance.
- 6.5.4 The **surveillant** sends the surveillance report to the responsible supervisor along with a request for corrective action (see QP-3.4, for guidance) for any identified nonconformance and/or deficiency.
- 6.5.5 Surveillances will be closed or remain open, as follows:

- Surveillance where all areas investigated were found satisfactory are closed when the report is issued.
- Surveillance where minor deficiencies were detected and corrected immediately should also be closed.
- A surveillance is held open if conditions were found that did not comply with requirements and were not corrected immediately. The report shall identify each significant uncorrected condition as a nonconformance and/or deficiency.
- If adverse conditions could not be immediately corrected, but commitments for action were obtained, the surveillance report shall contain the commitments, identity of the responsible individual(s), and the date(s) for completion of corrective action.

6.5.6 The **surveillant** shall describe items that are not elements of compliance or those that are minor in nature, but may lead to future significant problems in the surveillance report as Observations.

Note: Observations do not require a response, however, the supervisor of the activity should be made aware that observations need evaluation and appropriate actions taken. Exemplary or noteworthy practices can also identified as Observations.

6.5.7 The **supervisor** shall respond to a surveillance report and all identified nonconformance and deficiency within 10 working days.

6.5.8 If response is not received within the specified time, the **surveillant** shall request QPPL assistance.

6.5.9 The **surveillant** signs the surveillance report and acquires a review signature from the QPPL.

6.5.10 The **surveillant** shall distribute a copy of the completed (open or closed) report to the supervisor.

6.6 Perform Surveillance Follow-up

6.6.1 The **surveillant** shall evaluate responses to all identified nonconformances and/or deficiencies for completeness and determines the adequacy of the proposed corrective actions.

Note: Responses are considered adequate when actions are planned to bring the activities and supporting documentation into compliance with existing procedural requirements/processes, or the procedural requirements document or work process is revised to conform to current practice.

6.6.2 The **surveillant** shall return inadequate responses to the responsible organization with a request for a second response.

Note: Acceptance of a response may be a brief memo, documented phone call, or electronic mail.

6.6.3 When a corrective action is received, the **surveillant** shall follow the progress of the commitment.

6.6.4 When the corrective action is completed, the **surveillant** shall verify the completion.

6.6.5 When all nonconformances and/or deficiencies are corrected, the **surveillant** closes the surveillance report and associated nonconformance, deficiency, corrective action report.

6.7 Perform Lessons Learned

During the performance of work, **ER Project personnel** shall identify, document and submit lessons learned, as appropriate in accordance with QP-3.2, Lessons Learned, located at: http://erinternal.lanl.gov/home_links/Library_proc.htm.

7.0 RECORDS

The **surveillant** is responsible for submitting the following records (processed in accordance with QP-4.4, Record Transmittal to the Records Processing Facility) to the Records Processing Facility.

7.1 Surveillance report (electronic and hardcopy)

7.2 Completed document signature form

7.3 Associated correspondence

8.0 TRAINING

8.1 All users of this QP are trained by reading the procedure. The **user** shall ensure the training is documented in accordance with QP-2.2, Personnel Orientation and Training, and is entered in the ER Project Training Database located at _____.

8.2 The **supervisor** shall monitor the proper implementation of this procedure and ensures that relevant team members have completed all applicable training assignments in accordance with QP-2.2, Personnel Orientation and Training.

9.0 ATTACHMENTS

None

[Using a token card, click here to record "self-study" training to this procedure.](#)

If you do not possess a token card or encounter problems, contact the RRES-ECR training specialist.